

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TOMMY R. ORTIZ,)	
)	
Plaintiff,)	Case No.: 18-cv-3385
)	
vs.)	Hon. Edmond E. Chang
)	
)	
WILLIAM EPPERSON, et al.)	
)	
Defendants.)	

**DEFENDANTS WILLIAM EPPERSON AND THOMAS ZUBIK’S
MOTION TO DISMISS**

Defendants William Epperson and Thomas Zubik, by their attorney, Kwame Raoul, Attorney General for Illinois, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, hereby move this Court to dismiss the claim against them in Plaintiff’s Second Amended Complaint. The grounds for this motion are set forth in the accompanying memorandum of law. Counsel for Defendants Epperson and Zubik conferred with Plaintiff’s counsel regarding this motion and Plaintiff’s counsel advised that they had no objection to the filing of the motion but that they would be opposing the motion.

WHEREFORE, Defendants William Epperson and Thomas Zubik respectfully request that this honorable Court grant their motion to dismiss the claim against them in Plaintiff’s Second Amended Complaint.

Respectfully Submitted,

KWAME RAOUL

/s/ Erin Walsh

Attorney General of Illinois

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